

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND

IN RE:

MONICA D. JONES

Debtor

Case No. **19-23507-NVA**
Chapter 13

**MOTION TO DISMISS AND
NOTICE OF OPPORTUNITY FOR A HEARING**

Comes now, REBECCA A. HERR, Chapter 13 Trustee herein and states that the Debtor is in material default with respect to the terms of the plan as confirmed by the Court in that the payments by or for the Debtor has not been made as proposed.

The material default consists of \$6,830.15, representing 12.15 plan payments.

WHEREFORE, the Trustee moves that the subject case be dismissed pursuant to 11 U.S.C. Sec. 1307(c).

Respectfully Submitted,

/s/ REBECCA A. HERR

REBECCA A. HERR
CHAPTER 13 TRUSTEE
185 ADMIRAL COCHRANE DR.
SUITE 240
ANNAPOLIS, MD 21401
RHERR@CH13MD.COM

Date: January 31, 2022

**NOTICE OF OPPORTUNITY TO REQUEST A HEARING
TO THE DEBTOR AND COUNSEL OF RECORD**

You are notified of the filing of the foregoing Motion by the Trustee stating that the Debtor is in material default with respect to the terms of the confirmed plan and requesting that the subject case be dismissed pursuant to 11 U.S.C. 1307 (c).

You are further notified that unless a responsive pleading is filed with the Court stating facts which controvert, justify or explain the Trustee's allegations and a copy of said pleading is served upon the Trustee on or before **February 21, 2022** together with a request for a hearing thereon, this case will be dismissed on such date and the case will be closed. You are further advised that you may move to convert this case to a case under Chapter 7. If you desire to do so, such action must be filed with the clerk's office before **February 21, 2022**. A \$25.00 fee is required to the clerk's office for conversion to Chapter 7.

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of January, 2022, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Motion to Dismiss will be served electronically by the Court's CM/ECF system on the following:

Kim D. Parker kp@kimparkerlaw.com, ecf_notices@kimparkerlaw.com;arc@kimparkerlaw.com
(Attorney for Debtor)

I hereby further certify that on the 31st day of January, 2022, a copy of the Motion to Dismiss was also mailed first class mail, postage prepaid to:

MONICA D. JONES
5620 PRINCE GEORGE STREET
BALTIMORE, MD 21207
Debtor

/s/ REBECCA A. HERR

REBECCA A. HERR
CHAPTER 13 TRUSTEE

RECEIPT HISTORY

Receipt Date	Receipt Source	Receipt Description	Receipt Amount
01/07/2020	6463402000	EPAY - Standard Payment	\$415.00
01/07/2020	6463549000	EPAY - Standard Payment	\$417.00
09/01/2020	7054222000	EPAY - Standard Payment	\$1,500.00
12/07/2020	7292506000	EPAY - Standard Payment	\$300.00
01/26/2021	7403571000	EPAY - Standard Payment	\$300.00
02/10/2021	7444687000	EPAY - Standard Payment	\$300.00
02/16/2021	7457322000	EPAY - Standard Payment	\$200.00
04/13/2021	7596749000	EPAY - Standard Payment	\$500.00
07/20/2021	7822090000	EPAY - Standard Payment	\$562.01

TOTAL RECEIPTS: \$4,494.01